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April 9, 2021

Via ECF

The Honorable John G. Koeltl
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007

Re: In re Application of Shervin Pishevar, 1:19-mc-00503-JGK-SDA

Dear Judge Koeltl:

We are counsel to the Petitioner Shervin Pishevar in the above-captioned matter. We write to respectfully request, with the consent of the Respondent Marcus Baram, that the Court adjourn the oral argument that is currently scheduled for April 22, 2021 pending the Petitioner's investigation of new information, which may obviate Petitioner's need for the present action.

As stated in the status update filed concurrently on behalf of both parties, Petitioner has filed a separate 1782 proceeding in the Central District of California seeking information from Sam Anson, and is awaiting the decision on its 1782 application there.

The Petitioner therefore respectfully requests an adjournment of the April 22, 2021 hearing until Petitioner's investigation into this new development is complete, including if necessary following up with any information that Sam Anson may be able to provide (if ordered by the court to do so).

Pursuant to Your Honor's Individual Practices Section I.E, the Petitioner states further that:

1. Oral argument is currently set for April 22, 2021 at 3:30 PM.
2. The parties have previously submitted two requests for adjournment:
 - a. a request dated February 2, 2021 (submitted by the Respondent with the Petitioner's consent), *see* ECF 102; and

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- b. a request dated February 9, 2021 (submitted by the Petitioner with the Respondent's consent), *see* ECF 104.
3. The Court granted the previous requests for adjournment. *See* ECF 103, 105.
4. The Respondent consents to the Petitioner's present request for adjournment.

We are grateful for Your Honor's attention to this matter.

Respectfully,

/s/ Lucas V. M. Bento

Lucas V. M. Bento

Cc: Megan H. Daneshrad, Esq. (Counsel for Respondent) (via ECF)
Toby Butterfield, Esq. (Counsel for Respondent) (via ECF)
Zaid Shukri, Esq. (Counsel for Respondent) (via ECF)

Oral argument is adjourned until Monday, June 14, 2021, at 2:30pm.

SO ORDERED.

New York, New York
April 14, 2021

/s/ John G. Koeltl
John G. Koeltl
U.S.D.J.